

655 North Central Avenue  
Suite 2300  
Glendale, CA 91203-1445

**LEWIS**  **ROCA**

1 CONSTANTINE MARANTIDIS, CA Bar No. 173318  
cmarantidis@lewisroca.com  
2 G. WARREN BLEEKER, CA Bar No. 210834  
wbleeker@lewisroca.com  
3 LEWIS ROCA ROTHGERBER CHRISTIE LLP  
655 N. Central Ave., Suite 2300  
4 Glendale, CA 91203-1445  
Telephone: (626) 795-9900  
5 Facsimile: (626) 577-8800  
6 Attorneys for Plaintiff  
NATUREZWAY, INC.

7  
8 Nicholas C. Larson (SBN 275870)  
NLarson@MPBF.com  
9 MURPHY, PEARSON, BRADLEY & FEENEY  
520 Pike Street, Suite 1205  
10 Seattle, WA 98101  
Telephone: (206)-219-2008  
11 John A. Safyurtlu (SBN 179502)  
John.Safyurtlu@GeneralCounselPC.com  
12 GENERAL COUNSEL, PC  
64 Meadow Valley  
13 Irvine, CA 92602  
Telephone: (714) 651-9848  
14 Attorneys for Defendants  
15 AMERICAN HYGIENICS CORPORATION  
INNOVENT, INC.

16  
17 UNITED STATES DISTRICT COURT  
18 CENTRAL DISTRICT OF CALIFORNIA

19  
20 NATUREZWAY, INC., a California  
corporation,

21 Plaintiff,

22 vs.

23 AMERICAN HYGIENICS  
24 CORPORATION,  
a Chinese corporation; and  
25 INNOVENT, INC., a Florida  
corporation,

26 Defendants.  
27  
28

Case No. 2:23-cv-06724-FLA-AJR

**JOINT STATEMENT PURSUANT  
TO LOCAL CIVIL RULE 83-9.2  
DEFENDANT AMERICAN  
HYGIENICS CORPORATION'S  
MOTION TO DISMISS  
SPECIALLY APPEARING  
DEFENDANT AMERICAN  
HYGIENICS CORPORATION  
PURSUANT TO FRCP 12(b)(2)**

**Hon. Fernando L. Aenlle-Rocha**

1 Pursuant to Local Civil Rule 83-9.2, Plaintiff Naturezway, Inc. (“Plaintiff”  
2 or “Naturezway”) and Defendants American Hygienics Corporation (“AHC”) and  
3 Innovent, Inc. (“Innovent”) (collectively, “Defendants”) (Plaintiff and Defendants  
4 are referred to collectively as the “Parties”) jointly request that a decision be made  
5 on Defendant AHC’s Motion to Dismiss Specially Appearing Defendant American  
6 Hygienics Corporation Pursuant to FRCP 12(b)(2) (Dkt. 20), filed November 28,  
7 2023, and taken under submission by the Court on January 16, 2024 (Dkt. 38).

8  
9 Respectfully submitted,

10 LEWIS ROCA ROTHGERBER  
CHRISTIE LLP

11 Dated: May 15, 2024

12 By /s/G. Warren Bleeker  
G. Warren Bleeker

13 Attorneys for Plaintiff  
14 NATUREZWAY, INC.

15 MURPHY, PEARSON,  
16 BRADLEY & FEENEY

17 Dated: May 15, 2024

18 By /s/Nicholas C. Larson  
Nicholas C. Larson

19 Attorneys for Defendants  
20 AMERICAN HYGIENICS  
CORPORATION and INNOVENT, INC.

21 L.R. 5-4.3.4(a)(2)(i) Certification:

22 *All other signatories listed, and on whose behalf the filing*  
23 *is submitted, concur in the filing’s content and have authorized the filing.*

24 /s/G. Warren Bleeker  
25 G. Warren Bleeker